

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 3343



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARY

2017 SEP 18 PM 1:57

September 18, 2017

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer *EWL for*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: Kristin D. Roser/Ben Holly *KR BH*
Reports Analysis Division
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2017 Mid-Year Report for the
Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2017 Mid-Year Report in accordance with 52 U.S.C. § 30104(a). The Mid-Year Report was due on July 31, 2017.

The committees listed in the attached RTB Circulation Report either failed to file the report, no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

Recommendation

1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

9/18/2017 9:42 AM

Federal Election Commission
Reason to Believe Circulation Report
2017 MID-YEAR REPORT Not Election Sensitive 07/31/2017 UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3341	C00623256	AMERICA COMES FIRST PAC		DAVID W. SCHAMENS	\$154,404	3		Not Filed	\$154,404 (est)	\$13,371
3342	C00571398	BLAKPAC		SANDRA LOPEZ	\$142,914	0	8/25/2017	25	\$142,913	\$5,183
3343	C00630012	IT STARTS TODAY		JONATHAN ZUCKER	\$277,875	0	9/5/2017	Not Filed	\$277,875	\$11,114
3344	C00623355	NATIONAL TREASURY EMPLOYEES UNION ADVOCACY COMMITTEE		DEBORAH JANSEN	\$371,152	0		Not Filed	\$371,152 (est)	\$12,503
3345	C00625285	PHYLLIS SCHLAFLY'S EAGLE PAC		ED MARTIN	\$140,179	0		Not Filed	\$140,179 (est)	\$6,252
3346	C00502807	UNITED STATES PEANUT POLITICAL ACTION COMMITTEE (US PEANUT PAC)		ROBERT L. REDDING JR.	\$126,633	0		Not Filed	\$126,633	\$6,252

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation - 2017)
Mid-Year Report for the Administrative)
Fine Program:)
AMERICA COMES FIRST PAC, and) AF# 3341
SCHAMENS, DAVID W MR. as treasurer;)
BLAKPAC, and SANDRA LOPEZ as) AF# 3342
treasurer;)
IT STARTS TODAY, and ZUCKER,) AF# 3343
JONATHAN as treasurer;)
NATIONAL TREASURY EMPLOYEES) AF# 3344
UNION ADVOCACY COMMITTEE, and)
JANSEN, DEBORAH as treasurer;)
PHYLLIS SCHLAFLY'S EAGLE PAC,) AF# 3345
and MARTIN, ED as treasurer;)
UNITED STATES PEANUT POLITICAL) AF# 3346
ACTION COMMITTEE (US PEANUT)
PAC), and ROBERT L REDDING JR as)
treasurer;)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission,
do hereby certify that on September 20, 2017 the Commission took the following
actions on the Reason To Believe Recommendation - 2017 Mid-Year Report for the
Administrative Fine Program as recommended in the Reports Analysis Division's
Memorandum dated September 18, 2017, on the following committees:

AF#3341 Decided by a vote of 5-0 to: (1) find reason to believe that AMERICA
COMES FIRST PAC, and SCHAMENS, DAVID W MR. in his official capacity as
treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the
civil money penalty would be the amount indicated on the report; (2) send the appropriate
letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted
affirmatively for the decision.

AF#3342 Decided by a vote of 5-0 to: (1) find reason to believe that BLAKPAC, and SANDRA LOPEZ in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3343 Decided by a vote of 5-0 to: (1) find reason to believe that IT STARTS TODAY, and ZUCKER, JONATHAN in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3344 Decided by a vote of 5-0 to: (1) find reason to believe that NATIONAL TREASURY EMPLOYEES UNION ADVOCACY COMMITTEE, and JANSEN, DEBORAH in her official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3345 Decided by a vote of 5-0 to: (1) find reason to believe that PHYLLIS SCHLAFLY'S EAGLE PAC, and MARTIN, ED in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3346 Decided by a vote of 5-0 to: (1) find reason to believe that UNITED STATES PEANUT POLITICAL ACTION COMMITTEE (US PEANUT PAC), and ROBERT L. REDDING JR in his official capacity as treasurer violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

September 21, 2017
Date

Dayna C. Brown
Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 21, 2017

Jonathan Zucker, in official capacity as Treasurer

It Starts Today

237 Florida Avenue NW

Washington, DC 20001

C00630012

AF#: 3343

Dear Mr. Zucker:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a Mid-Year Report of Receipts and Disbursements in any calendar year other than one during which a regularly scheduled general election is held. This report, covering the period January 1, 2017 through June 30, 2017, shall be filed no later than July 31, 2017. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report within thirty (30) days of the due date, the report is considered not filed for the purpose of calculating the civil money penalty. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On September 20, 2017, the FEC found that there is reason to believe ("RTB") that It Starts Today and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before July 31, 2017. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$11,114. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$11,114 is due within forty (40) days of the finding, or by October 30, 2017, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive

Level of Activity: \$277,875

Number of Days Late: Not Filed (reports not filed within thirty (30) days of the due date are considered not filed for the purpose of calculating the penalty)

Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

- 1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or October 30, 2017. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that It Starts Today and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Steven T. Walther
Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$11,114 for the 2017 Mid-Year Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: It Starts Today

FEC ID#: C00630012

AF#: 3343

PAYMENT DUE DATE: October 30, 2017

PAYMENT AMOUNT DUE: \$11,114

IT STARTS TODAY

Attachment 1
31 Pages

RECEIVED
FEC MAIL CENTER

2017 OCT 24 AM 10: 27

October 16, 2017

Office of Administrative Review
Federal Election Commission
999 E Street, NW
Washington, DC 20463

C00630012
AF#: 3343

To whom it may concern:

I write today to challenge the Civil Money Penalty assessed by the Federal Election Commission ("Commission" or "FEC") in your letter of September 21, 2017. While the report was most certainly "not filed" (more than 30 days late), we feel that we used our best efforts to report on time and were prevented from doing so by unforeseeable circumstances beyond our control: specifically, we could not have reasonably anticipated the technical difficulties we faced in uploading our data into NGPVAN's compliance software.

It Starts Today's primary activity is to raise funds for every 2018 Democratic nominee for Congress. We do this through monthly recurring donations to 468 "Nominee funds" that we operate in accordance with FEC Advisory Opinion 1982-23. At present we have thousands of subscribers, each making 468 earmarked donations per month. For the reporting period at issue, this resulted in over 4 million individual earmarked donations. Added to this are several thousand other, non-earmarked contributions and the expenditures made in support of our mission.

While that is a lot of donation records, it is not actually a lot of data, nor is it complex, having only a handful of data fields (donor name, address, employer, occupation, date, amount and a "note" explaining the earmark). We thought we might be able to use FECFile (which I have used extensively over time) and, if not, felt there were several commercial providers with experience filing for Presidential campaigns which generate orders of magnitude more data than we do. We felt our relatively straightforward needs would be simple for them to handle. This did not prove to be the case, but we do not feel that was reasonably foreseeable.

The fundamental unexpected issue we ran into was that NGPVAN's upload process involved two steps: first processing contact data and then "applying" contributions to those records. While the contact upload processing was, as one would expect, quite quick (taking no more

<http://itstarts.today> • 237 Florida Ave NW • Washington, DC 20001 • info@itstarts.today

than a few minutes for even our largest files), the upload of contributions turned out to be glacial: a single uploaded file of 50,000 records taking a minimum of 8 and as many as 12 days to complete. And attempting to upload more than 4 files simultaneously resulted in obvious degradation in speed. It is this unexpected technical issue (please note that the contribution records contained much less data than the contact records: only date, amount and "note" for the FEC report. We had reasonable expected all data upload would be handled at the speed of the contact records (which contained many times the amount of data of the contributions), but we were wrong.

Even when, on August 16 we requested an alternative filing solution, that still took more than 2 weeks of back and forth to get filed.

To show the effort we put into filing on time, even though we failed, here is the timeline of our efforts and our difficulties. We hope you will agree that they meet the standard of "best efforts to file in a timely fashion." We have also substantiated this timeline with printouts of our bug reports (showing their slow response and inability to fix the issues) and e-mail correspondence. Timely filing is our responsibility, but we gave it our best efforts and were stymied by reasonably unforeseen technical hurdles.

1) Around June 1, 2017, I began entering all of the non-earmarked, non-recurring contributions we had received to date and all of our committee expenditures into FECFile. This process was completed by early July, within a week of the end of the reporting period.

2) Around July 10, I engaged in my first upload attempt of a batch of 100,000 of our recurring donations into FECFile. This attempt failed (the upload was extremely slow and the size of the committee file became too large for our Windows machine to handle), so I tried another, smaller file a few days later. After that, too, failed, it became apparent that I was going to be unable to use FECFile to handle our filing. I began researching options for other vendors, settling on NGPVAN based on the existence of their bulk upload engine, specifically including a tool for using Unique IDs to upload (which should have radically simplified post-upload processing), and their experience with large statewide and national candidates, making our 4+M donation records a very small drop in their total database size.

3) On July 14, I reached out to NGPVAN to establish an account (they do not have any sort of automated account sign-up given the unique nature of each client). On July 20, they established our initial account, but in spite of repeated inquiries on our part (they initially wanted to schedule my initial training for after the filing deadline) we were not able to get through the full onboarding process until July 28. I will still optimistic we could file on time as exporting the data had been a 20 minute process for our database and importing should not have taken much longer. See attachment A3 for onboarding conversation, specifically the scheduling difficulty in doing a 1 hour training that had been promised during our verbal conversations.

4) On July 28, we started entering our manual expenditure and donation data (the information we had already put into FECFile), and ran a bulk data upload test. Our initial test of data using .xls (microsoft excel) file format was quickly and successfully imported. We began preparing all of our data in this way. It took a couple of days to prepare our files in the .xls format.

5) On July 31, with training and tests complete, we started preparatory uploads, specifically we uploaded all of our donor data (name, address, employer, occupation) along with a unique identifier we had arranged with NGPVAN to use in identifying our donors as well as all of our nominee funds. This would, based on conversations with sales representatives, let us link the donations to the donor using an ID, without having to use time consuming matching algorithms based on name and address.

6) We then attempted to upload a file containing 100,000 records. It produced errors, which, through trial and error as nobody answered the phone when we called for support, we eventually discovered had to do with the number of rows of data. Apparently their import of .xls (excel) format files was limited to 65k records (a file size limit that Excel had not had in place for several years); this limitation had not been conveyed to us. We set about breaking our 4+M records into 85 files of ~50k records.

7) In the meantime (still on July 31), knowing we were likely to be a few days late in our filing, we started uploading a smaller, but still large file of donations that for a variety of reasons were not part of our larger export: 12,888 "non-recurring" donation records. We quickly discovered that there was a problem with their ID-based upload system. While we could use the unique ID we had incorporated to match our donation records to our donor records, their ID-based upload engine did not allow us to include required compliance data, specifically the "note" field we needed to use to identify the earmarked contributions. (Just to be clear, their non-ID-based systems, which are far more resource intensive and therefore slower, allow for the inclusion of compliance data.)

8) (Still July 31) After a phone consultation with staff, we decided to start our non-recurring contribution uploads using their non-ID based systems and began the upload of a 12,888 record file. This first moderately large file, containing 12,888 records and mixing contact information and contribution data was not processing at the expected speed. Where our test files, and our donor records had processed almost immediately, the contributions portion of this file was clearly going to take days to process (though upload had been quick. This was completely unexpected. We were simply uploading name, address, employer, occupation, date, donation amount, and a short "note." This is the fundamental issue for which we were not prepared and could not have been reasonably expected to foresee. Data is data and contributor information is much larger than contribution information, but the contributions were processing at a glacial pace, while the contributor information was quite fast. We reported this issue to our contact and were told they would look into it.

9) On August 1, after making sure it was not something we were doing incorrectly, we formally reported the bug in their ID-based upload systems and moved forward on using their non-ID based systems. (We did not get an answer to our bug report until August 3 and that answer was that not-including the FEC specific fields in that tool was an "intentional design decision.") See attachment A1 for report and responses.

10) Also on August 1, we started our first 50k file using NGP's standard (full address match) upload system, and while it uploaded in 15-30 seconds, with the contact match occurring within minutes, the processing of the "contributions" (which is even less data than the contact records: only date, amount and "note"), showed only a 1% completion after hours. On NGP staff advice that they were having issues with their "queue" system, we did not try to start a third file until the first two (this one and the 12,888, which still had not processed) were complete.

11) On August 3, our first 50k file was mysteriously cancelled while still incomplete. We restarted the file using their general upload system (but with our Unique Identifier) after getting the (unsatisfying) answer to our bug report on the ID-based upload engine. We were also advised that we might have better luck with .csv (windows) file formats as they were having trouble with their .xls import engine. See A5 for file log, including cancellations.

12) Also on August 3, we made our first inquiry if this process would be speeded by having us export the VANID (their unique identifier) out of their database, import it into ours, and re-export all of our data files with VANID included in the donation record. We were told that we should, instead, export our data file with full address information.

13) On August 4, our second attempt to upload the first .xls file, was cancelled by administrators. See A5.

14) On August 4, we restarted the first file in .xls format, but now with full address information (no longer trying to use the external ID match they had told us would speed the process during onboarding). As we had been advised that we could try more than one at the same time (they had fixed the "queue" system), we started a second .xls file and one .csv so that we could compare processing speeds. While these files eventually loaded correctly, it took over 10 days for any of them to finish. See A5.

15) On August 4, we started several additional files as well, all eventually cancelled. We were also advised that .csv format files were also having issues and we should use "windows tab delimited text file" format going forward. See A5.

16) From August 4 to 7, after many e-mails with NGP staff, we worked out how to get our exports into the correct .txt (windows tab delimited text format). We ended up having to export from our system as .xls and then use Microsoft Excel to open the .xls file and save as the right "windows text file" format. (Please note that during our sales and onboarding process we explicitly asked about file formats and were told they could handle "any common format,

including .xls, .csv and .txt." We also asked about the use of a unique identifier to speed things, and file size. Everything we were not finding difficult had been portrayed to us as being as easy as it should be with a modern database system.)

17) While we were struggling with the .txt process, we also made the internal decision to import the VANID into our system and re-export our files with this NGP unique identifier as it had become clear to us, in spite of NGP staff advice to the contrary, that their system treated the VANID differently from other unique identifiers.

18) On August 7 we started uploading .txt files in the correct formats. However, we ran into new issues, and the two files we started on the 7th were cancelled. See A5.

19) On August 9, we started uploading files, using the VANID as the primary match criterion and run into no further cancellations. However, the change to .txt files and the use of the VANID had only marginally increased upload speed, but files were now processing successfully, if extremely slowly. See A5.

20) After we received the RFAI dated August 16, I called and spoke to Ben Holly in the Reports Analysis Division to explain our difficulties. I told him at the time that we would try to get something in as soon as possible, but it was clear that a substantially incomplete report was likely to be as problematic as a "failed to file" report. I again reached out to NGP to find out if there was anything at all we could do to get the report filed as quickly as possible.

21) It took a few days, but with our files uploading at a glacial pace (around 7-8 days each for a 50k file at this point) and with a limit on how many files could be started without resulting in even slower processing times, NGP staff conceded that there was no way we'd have all our data in their system by even the end of the month. While they also let us know their engineers were working on these processing issues with contributions, they were still weeks away from deploying a fix for their incredibly slow bulk-upload engine. We would need to figure out a work-around. See attachment A4, starting August 17 when they reached out to get the data they needed for a workaround filing.

22) Working with NGP staff, we were able, over the next two weeks, to take the information that had been entered into their system for the non-earmarked donations and expenditures and combine it with our raw data files of the recurring donations to file as a report. This process was complicated by the partial nature of our upload successes and the need to incorporate expenditure reporting into our filing. See A4.

23) Figuring out exactly what data was where at this point (we'd re-entered all the data already put into FECFile into NGP during this process) was not simple and every back and forth cost us a day or two of time. See A4.

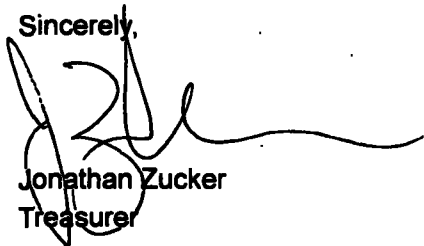
24) This report was filed September 5 and it was, in spite of being over 30 days late, the very best we could do. See A4.

We apologize for the failure to report in a timely fashion but hope that this explanation of the roadblocks we encountered and our diligence in pushing through each one as quickly as possible will show that we used our best efforts to file a timely report.

I should add that this experience will not be repeated. On September 7 or so, NGP let us know that the import engine optimization had been deployed and we could restart our efforts. We can now upload 10 files of 50k records each and have them processed within a day (this is a 100x improvement over having a single file take more than 10 days we experienced in early August). We have uploaded all of the reported data from the report at issue and have already uploaded July's data and will start August shortly.

We will not miss our next filing deadline. Please let me know if you have any additional questions. I can best be reached at jonathan@itstarts.today.

Sincerely,



Jonathan Zucker
Treasurer

Main Menu / Support Requests / No FEC Contrib; Load data with ID Mode

Support Requests

No FEC Contrib; Load data with ID Mode

Ticket # 178894

Subject No FEC Contrib; Load data with ID Mode

Error Code

Created By Jonathan Zucker, It Starts Today Co

Urgency Low Medium High

Assigned To Unassigned

Status Completed

Claimed By Nikki Norton

Status Pending ☒ Completed

Assign To

Attachment Attach a file

Copy To

Zucker, Jonathan

Remove

Add

Notes

Urgency Low Medium ☒ High

History

Add Action

User	Date	Time	Notes	Status	Assigned To	Copied To	Attachment
Zucker, J.	8/1/17	6:13 PM	1) Figure out a way I can send you the .xls file I am trying to use. Though it might not be necessary. 2) Use "Load data with ID" mode for the file.	Pending	VAN Support	VAN Staff Zucker, J.	

User	Date	Time	Notes	Status	Assigned To	Copied To	Attachment
			<p>3) Apply Contribution.</p> <p>4) Select "It Starts Today"</p> <p>5) Fail to see the "FEC PAC & Party Disclosure Report (Form 3X) for It Starts Today" options on the fields that can be applied.</p> <p>When I take the very same file and upload it using the "Load new contacts directly" mode and try "Apply Contribution" when I select "It Starts Today," I get the FEC PAC, etc options.</p> <p>However, when I tried it that way, the system auto-cancelled the upload.</p> <p>I am guessing this is because some of the IDs do not match (~500), which is fine and I can address that once I can see which ones they are, but I can't do the upload of the file without entering the FEC required data about the contributions.</p> <p>So... please fix it so that when using the Load Data with ID mode, you still can enter FEC data fields when Applying a Contribution.</p> <p>Thank you.</p>				
Norton, N.	8/1/17	7:36 PM	Hi Jonathan, I was able to replicate this behavior. I'll push it over to the product manager on this feature to look at.	Pending	Zucker, J		VAN Staff Norton, N. Zucker, J.
Zucker, J.	8/3/17	12:26 AM	Any update? This seems a modest permissioning issue and is a complete blocker on uploading data for a now late FEC filing?	Pending	Norton, N		VAN Staff Norton, N. Zucker, J.
Norton, N.	8/3/17	12:39 PM	I have not heard back from the feature manager yet, so am checking for an update.	Pending	Zucker, J		VAN Staff Norton, N. Zucker, J.
Norton, N.	8/3/17	2:01 PM	<p>Hi Jonathan, it looks like this was an intentional design decision for now. However, there is a way to make it work. You can actually match on VANID in a New Person Upload. So effectively, you get the same match standard, and that functionality. Put VANID in the first column of your file.</p> <p>Can we get on the phone and talk this through? I am at</p> <p>If I understand you correctly, this is more than slightly ridiculous.</p>	Pending	Zucker, J		VAN Staff Norton, N. Zucker, J.
Zucker, J.	8/3/17	3:49 PM	<p>You will let me upload contribution information using the EveryActionClientID as an external ID, but you won't permit access to the FEC Form 3x specific contribution fields.</p> <p>However, if I use the VANID, I can get access to the Form 3x specific fields.</p>	Pending	Norton, N		VAN Staff Norton, N. Zucker, J.
Norton, N.	8/3/17	4:14 PM	<p>ID matches are strong matches. You can map External ID with the new person BU type to get the functionality to add this info, if you don't have VANID on the file.</p> <p>Played with some things for a bit and I think I better understand.</p>	Pending	Zucker, J		VAN Staff Norton, N. Zucker, J.
Zucker, J.	8/3/17	4:14 PM	The problem is that the FEC Contribution specific fields are simply not an option at all when using the "Load data with" mode.	Pending	Norton, N		VAN Staff Norton, N. Zucker, J.

User	Date	Time	Notes	Status	Assigned To	Copied To	Attachment
			<p>You only get access to the FEC Contribution fields when using the "Load new contacts directly" field.</p> <p>I thought you were saying that if you used the "Load data with" but use the VANID, you could get access to those fields.</p> <p>The problem is that I don't have the VANID in the DB from which I am drawing this data.</p>				
Norton, N.	8/3/17	4:26 PM	<p>....to be clear, use the "Load new contacts directly" mode and map the External ID field. You'll get the match you need along with the functionality to load the disclosure form data.</p>	Pending	Zucker, J	VAN Staff Norton, N. Zucker, J.	
			<p>I just attempted a "Load New Contacts" upload using a file with 50k records in the following columns:</p> <p>EveryActionClientID Amount Date Note (this is for the FEC "note" field) Contact (this is for the "contact link" field of the FEC report, it will match contact names)</p>				
Zucker, J.	8/3/17	5:00 PM	<p>I uploaded the file.</p> <p>I "applied external ID" and set to match to the everyaction client ID.</p> <p>I "applied" contribution and filled out all those fields.</p> <p>And the upload auto-cancelled. I see no explanation as to why it was cancelled.</p>	Pending	Norton, N	VAN Staff Norton, N. Zucker, J.	
Norton, N.	8/3/17	6:00 PM	<p>Hi Jonathan, it looks like we are experiencing issues with uploading Excel files today. Can you attach a copy of your file to this ticket so I can take a look?</p>	Pending	Zucker, J	VAN Staff Norton, N. Zucker, J.	
			<p>...to add, I recommend a Tab Delimited Text format if you were using excel. If you have commas in the file, the bulk upload will read them as column breaks if you're using csv format.</p>				
Norton, N.	8/3/17	6:45 PM	<p>Also, I'm double checking that your external id is matching with that BU mode, and not simply applying. The "Load new contacts directly" upload type will also use the other personally identifiable information fields (i.e. name, address, etc) in your file to match to existing records.</p>	Pending	Zucker, J	VAN Staff Norton, N. Zucker, J.	
			<p>If you're new at using this tool, it's a good idea to run small sample files first, then double check that everything loaded correctly. It's much easier to undo 3-5 records by hand, than 1,000.</p>				
			<p>Sorry... did not see your reply yesterday.</p> <p>I ran smaller tests at first.</p> <p>And then moved into the major data files.</p>				
Zucker, J.	8/4/17	4:59 PM	<p>And I first tried the .xls files (which seemed to work perfectly fine) and then, following Nick's advice I tried .csv (windows format) file. That is the one that seems to have failed. It successfully uploaded the contacts, but then could not apply the contributions.</p> <p>I will stop trying to apply the External ID.</p> <p>I tried an xls upload today of two files. Both look to have</p>	Pending	Norton, N	VAN Staff Norton, N. Zucker, J.	

User	Date	Time	Notes	Status	Assigned To	Copied To	Attachment
			completed successfully.				
			I also tried a .csv upload today, and while it successfully added the contacts (100% complete), as you will notice if you look at my bulk uploads the application of contribution data is 0% complete. (I manually cancelled the application of the External ID as it clearly had no impact on how the contacts were uploaded.)				
			This is getting extremely tiresome and I am getting conflicting advice.				
			Nick told me to use .csv "windows".format.				
Zucker, J.	8/4/17	5:18 PM	I just tried a .txt tab delimited file. The upload engine read only the first line.	Pending	Norton, N	VAN Staff Norton, N. Zucker, J.	
Norton, N.	8/7/17	12:27 PM	Did you use Window's formatted?	Pending	Zucker, J	VAN Staff Norton, N. Zucker, J.	
Zucker, J.	8/7/17	2:06 PM	Good point. Will try again that way.	Pending	Norton, N	VAN Staff Norton, N. Zucker, J.	
			Ok... saved as "Windows Text File" and uploaded. Recognized 50k records and all the right columns.				
Zucker, J.	8/7/17	2:47 PM	I applied all the mapping and clicked finished. But now it has cancelled.	Pending	Norton, N	VAN Staff Norton, N. Zucker, J.	
			The upload is Q1Q2_0003.txt can you tell me why it cancelled (because I did not cancel it)??				
Norton, N.	8/7/17	3:58 PM	hmm, let me check.	Pending	Zucker, J	VAN Staff Norton, N. Zucker, J.	
Norton, N.	8/7/17	5:54 PM	Hi Jonathan, I know Kerry reached out to you via email because he had to cancel your uploads. Either he or I will follow up when you can try them again.	Pending	Zucker, J	VAN Staff Norton, N. Zucker, J.	
Norton, N.	8/8/17	5:25 PM	Hi Jonathan, I'm going to close out this ticket. The ticket regarding slowness is a separate issue being tracked with Kerry.	Completed		VAN Staff Norton, N. Zucker, J.	
			Status updated from Pending to Completed				
Zucker, J.	8/8/17	5:43 PM	The underlying issue, that you can't add FEC related fields to contributions uploaded in the "Add by ID" mode remains. I created a new, low priority, ticket raising that specific issue.	Completed		VAN Staff Zucker, J.	

Main Menu / Support Requests / "Apply Contributions" not processing



Support Requests

"Apply Contributions" not processing

Ticket # 179027

Subject "Apply Contributions" not processing

Error Code

Created By Jonathan Zucker, It Starts Today Co

Urgency Low Medium High

Assigned To VAN Staff

Status Pending

Claimed By Kerry Dolan

Status ☒ Pending ☐ Completed

Assign To*

Attachment

Copy To

Zucker, Jonathan

Remove

Add

Notes

Urgency Low Medium ☒ High

History

Add Action

User	Date	Time	Notes	Status	Assigned To	Copied To
Zucker, J.	8/4/17	5:10 PM	1) Upload .xls or .csv file (both have been tried). 2) Have the file successfully process the contacts. 3) Have 0% completion on the Apply Contributions action.	Pending	VAN Support	VAN Staff Zucker, J.

User	Date	Time	Notes	Status	Assigned To	Copied To
			Hey Jonathan,			
Dolan, K.	8/4/17	5:23 PM	Our Excel conversion utility is currently being worked on, and we discovered another bug yesterday where CSVs without a header row aren't importing properly. These both won't be fixed until next week, but can you reattempt the CSV import with a header row?	Pending	Zucker, J	VAN Staff Dolan, K. Zucker, J.
			If you had a header row, are you on a mac by chance?			
Dolan, K.	8/4/17	5:44 PM	Thanks, I've forwarded this ticket over to our data team to take a look at why that is stuck.	Pending	Zucker, J	VAN Staff Dolan, K. Zucker, J.
Zucker, J.	8/4/17	5:44 PM	The .csv (a) had a header row and (b) was saved as the explicitly "windows" version of the .csv file out of a mac excel program based on the instruction of Nick Blake.	Pending	Dolan, K	VAN Staff Dolan, K. Zucker, J.
			Again, in both cases, the file seemed to process the "upload contacts" portion without issue. It is simply not processing "apply contributions" at all.			
Zucker, J.	8/8/17	4:58 PM	Hey Kerry... any updates about either of these tickets?	Pending	Dolan, K	VAN Staff Dolan, K. Zucker, J.
			Hey Jonathan,			
Dolan, K.	8/8/17	5:30 PM	Sorry for the radio silence on this. There's actually a lot happening on this issue behind the scenes. We've been able to improve the processing rate 3-4 fold, but it's still running slowly due to some compliance auditing that is taking place. We're looking to see if we're able to make some changes to when that audit runs in order to greatly accelerate the process.	Pending	Zucker, J	VAN Staff Dolan, K. Zucker, J.
			Should I still hold off on uploading any new files or can I start some new ones?			
Zucker, J.	8/8/17	5:39 PM	Would it be helpful if we took the time to upload the VANID into our system (re-exporting the data files) and then, even though we have to use the "upload contacts" mode, our first column would be the VANID (and maybe we could skip all the name/address fields)?	Pending	Dolan, K	VAN Staff Dolan, K. Zucker, J.
			Would that be more efficient?			
Dolan, K.	8/8/17	5:44 PM	Let me run that past a few folks on our data team and see if it would sidestep anything.	Pending	Zucker, J	VAN Staff Dolan, K. Zucker, J.
Dolan, K.	8/8/17	5:50 PM	I don't think I'll have an answer on this point until tomorrow. My expectation is that this will not speed things up due to the way they're talking about changing things. I don't think I'll have clarity on this at least until mid morning tomorrow.	Pending	Zucker, J	VAN Staff Dolan, K. Zucker, J.
Zucker, J.	8/9/17	11:26 AM	Any update?	Pending	Dolan, K	VAN Staff Dolan, K. Zucker, J.
			Hi Jonathan,			
			You can go ahead and start the upload on your additional files. These will need to be done as the new person uploads. The reason for that is that this is the only upload type that is able to distinguish between person records and organization records - which determines fields that we display.			
Dolan, K.	8/9/17	12:03 PM	The reason these are taking so long to process is because each of these rows are generating fields for the disclosure report and also running against a rules engine to ensure they are valid. We're working on some optimizations, but the nature of the compliance element is that these uploads take considerably longer than a non-compliance upload.	Pending	Zucker, J	VAN Staff Dolan, K. Zucker, J.
Zucker, J.	8/9/17	12:13 PM	Thank you.	Pending	Dolan, K	VAN Staff Dolan, K.

User	Date	Time	Notes	Status	Assigned To	Copied To
						Zucker, J.
Zucker, J.	8/9/17	2:58 PM	Hey Kerry... I have uploaded 3 files over the last 15-20 minutes (or so) and none of them have asked me to "approve" them. Am I doing something wrong?	Pending	Dolan, K	VAN Staff Dolan, K. Zucker, J.
Dolan, K.	8/9/17	3:04 PM	No, you're doing everything right. That isn't showing up yet because the server hasn't opened up a window to begin the match process to present you with those match levels. I've got data pushing this through for you now. It'll still be a few but I think we can expect this within the next half hour.	Pending	Zucker, J	VAN Staff Dolan, K. Zucker, J.
Dolan, K.	8/9/17	3:11 PM	Those are now available for approval. Just out of curiosity, do you have any further batches you'll be uploading?	Pending	Zucker, J	VAN Staff Dolan, K. Zucker, J.
Zucker, J.	8/9/17	5:10 PM	There are a lot of batches to go. I am starting to get the feeling that this is a manual process on your end. Every time I upload, Someone has to approve.	Pending	Dolan, K	VAN Staff Dolan, K. Zucker, J.
Dolan, K.	8/9/17	5:13 PM	Can you give me a rough estimate on the total number of transactions/rows you're uploading into the system?	Pending	Zucker, J	VAN Staff Dolan, K. Zucker, J.
Zucker, J.	8/9/17	5:29 PM	It's in the 6 figures. 3-4M rows. It is a lot of very little earmarked contributions. Not a ton of donors, but they are monthly and the donations are to every 2018 Democratic nominee. And the FEC requires them to be reported individually.	Pending	Dolan, K	VAN Staff Dolan, K. Zucker, J.

A3



Jonathan Zucker <jonathan@itstarts.today>

Welcome to EveryAction - It Starts Today Co

Jonathan Zucker <jonathan@itstarts.today>
To: Nicholas Blake <NBlake@everyaction.com>
Cc: Ellen Ytterberg <EYtterberg@everyaction.com>

Fri, Jul 28, 2017 at 2:15 PM

Thank you, Nick.

3pm should be fine.

Much appreciated.

On Fri, Jul 28, 2017 at 2:14 PM, Nicholas Blake <NBlake@everyaction.com> wrote:

Hi Jonathan,

Understood. I'm going to clear out some time this afternoon. Are you still available at 3:00 PM (ET) to jump on a webinar?

Thanks,

NICK BLAKE

Client Services Specialist, EveryAction

P. 202.370.8050 | E. easyupport@everyaction.com

[Follow us on Twitter](#) | [Like us on Facebook](#)

From: Jonathan Zucker [<mailto:jonathan@itstarts.today>]

Sent: Friday, July 28, 2017 2:02 PM

To: Nicholas Blake <NBlake@everyaction.com>

Cc: Ellen Ytterberg <EYtterberg@everyaction.com>

Subject: Re: Welcome to EveryAction - It Starts Today Co

I need to import a couple of thousand donors.

I need to import a lot more donations.

Once shown exactly how the process works (file format and process) to (1) import donors with some sort of external unique ID and (2) import donations linked to those donors, I am quite confident of my ability to do the imports myself.

I also need to know how exactly to (3) enter non-imported expenditures and, finally, (4) how to file a report.

It is really (1) and (2) that I am concerned about, particularly the use of an external ID to ensure that multiple transactions are correctly connected to the right donor.

— ۱۰۰ —

Hi Jonathan,

Thanks,

Client Services Specialist, EveryAction

P. 202.370.8050 | E. easupport@everyaction.com

Follow us on Twitter | Like us on Facebook

From: Jonathan Zucker [mailto:jonathan@itstarts.today]

Sent: Friday, July 28, 2017 1:17 PM

To: Ellen Ytterberg <EYtterberg@everyaction.com>

Cc: Nicholas Blake <NBlake@everyaction.com>

Subject: Re: Welcome to EveryAction -It Starts Today Co

The problem with next week is that it is after the filing deadline on Monday.

On Fri, Jul 28, 2017 at 1:13 PM, Ellen Ytterberg <EYtterberg@everyaction.com> wrote:

Hi Jonathan,

I apologize for the hold up on this. Are there a couple time frames next week that work well for you?

Thanks,

Ellen

ELLEN YTTERBERG

A3

Research Manager

NGP VAN + EveryAction

P. (202) 686-9330 | D. (202) 355-6206 | E. eytterberg@everyaction.com

From: Jonathan Zucker [mailto:jonathan@itstarts.today]

Sent: Friday, July 28, 2017 12:59 PM

To: Nicholas Blake <NBlake@everyaction.com>

Cc: Training <Training@ngpvan.com>; Louis Levine <llevine@ngpvan.com>

Subject: Re: Welcome to EveryAction - It Starts Today Co

Hey folks... looping back on this.

Pretty frustrating not to have an answer or anyone available during an entire business day for a 1 hour session.

I am available the rest of the day and would like to get this done.

Thanks.

Jonathan

On Wed, Jul 26, 2017 at 5:48 PM, Nicholas Blake <NBlake@everyaction.com> wrote:

Hi Jon,

I am unfortunately not available at these times myself, but I've copied our Training team to coordinate.

Thanks,

NICK BLAKE

Client Services Specialist, EveryAction

P. 202.370.8050 | E. easupport@everyaction.com

[Follow us on Twitter](#) | [Like us on Facebook](#)

From: Jonathan Zucker [mailto:jonathan@itstarts.today]

Sent: Wednesday, July 26, 2017 5:06 PM

To: Nick Blake <NBlake@ngpvan.com>

Subject: Re: Welcome to EveryAction - It Starts Today Co

A3

Want to follow-up on this, Nick. Tomorrow before Thursday or Friday still work. Given that there is a filing deadline next week, would like to do this asap.

Thanks.

On Tue, Jul 25, 2017 at 2:03 PM, Jonathan Zucker <jonathan@itstarts.today> wrote:

Hi Nick...

I'd like to arrange a 1:1 training session. Specifically, I need to understand:

- 1) How to upload donors into the database.
- 2) How to upload donation records for those donors.
- 3) How to enter expenditures and other donations.
- 4) How to filing an FEC report.

Could we schedule time tomorrow (7/26) before 2pm? Or Thursday before 12:30pm? Or Friday (pretty flexible from 10am to 4pm).

Thanks.

Jonathan

On Thu, Jul 20, 2017 at 4:15 PM, Nick Blake <NBlake@ngpvan.com> wrote:



Hi Jonathan Zucker,

Welcome to EveryAction!

A3

You have access to the It Starts Today Co EveryAction database.

Create an Action ID

You will receive a separate email with instructions on how to create your ActionID. Please note that the link found in the email is valid for 48 hours. If this is your first time logging into EveryAction, you will need to create an ActionID.

If you already have access to other EveryAction databases with the email address this invitation was sent to, you will need to connect this database to your existing ActionID. Click here to complete this connection.

"Make sure you are logged out of all EveryAction databases before activating your user account."

As you get comfortable with EveryAction, please review our helpful tips:

Bookmark it

Make sure you bookmark <http://app.everyaction.com> into your browser for a quick and easy log in.

Training

Please contact us to arrange a 1:1 training. This training will be conducted over the phone and via web conference. The session will last an hour. This training will be conducted over the phone and via web conference. We also hold regular weekly group training sessions, please sign up for a public training [here](#).

EveryAction Support Center

The EveryAction Support Center provides step-by-step instructions with images on a number of different subjects to help you get on your way. It's located in the pull down menu under your name in the upper right hand corner of the application menu.

Still need assistance or technical support?

Please contact us at (202) 370-8050 and press 1 or EASupport@everyaction.com between 9 AM and 6 PM Eastern, Monday through Friday.

9

Update My Contact Info
Change Password
Email Preferences
Manage Payment Options

 My ActionID

Update My ActionID Profile
Add another account to my ActionID
Remove link to cvardamis

EveryAction Help Docs

Log Out

Best,

EveryAction

14-00000

A4

It Starts Today

Starts Today Today

Jonathan Zucker <jonathan@itstarts.today>

Contribution Data

31 messages

Kerry Dolan <kdolan@ngpvan.com>

Thu, Aug 17, 2017 at 5:57 PM

To: Jonathan Zucker <jonathan@itstarts.today>

Cc: EveryAction Support <EASupport@everyaction.com>, Louis Levine <llevine@ngpvan.com>

Hi Jonathan,

Do you happen to have all of your data in a single file containing person contact info as well as the contribution data?

If so, would you be able to DropBbox that to us?

Thanks,

KERRY DOLAN

Client Services, EveryAction

P. 202.370.8050

Kerry Dolan <kdolan@ngpvan.com>

Thu, Aug 17, 2017 at 6:01 PM

To: Jonathan Zucker <jonathan@itstarts.today>

Cc: EveryAction Support <EASupport@everyaction.com>, Louis Levine <llevine@ngpvan.com>

Sorry, to provide some context we're going to try loading this an alternate way if possible.

Thanks,

KERRY DOLAN

Client Services, EveryAction

P. 202.370.8050

From: Kerry Dolan

Sent: Thursday, August 17, 2017 5:57 PM

To: Jonathan Zucker <jonathan@itstarts.today>

Cc: EveryAction Support <EASupport@everyaction.com>; Louis Levine <llevine@ngpvan.com>

Subject: Contribution Data

[Quoted text hidden]

Jonathan Zucker <jonathan@itstarts.today>

Thu, Aug 17, 2017 at 6:27 PM

To: Kerry Dolan <kdolan@ngpvan.com>

Cc: EveryAction Support <EASupport@everyaction.com>, Louis Levine <llevine@ngpvan.com>

Sure. Figured that was why you were asking.

I need to know an exact specification for the file as this will be a data dump from our app. Can you point me to a spec I can give my lead dev?

The vast majority of the data will have a VANID as the first column (not quite all of it, but most). Hopefully that will make this process easier on you as no contact matching will be required.

Would it be better for me to give you two files? One with VANID, one without?

[Quoted text hidden]

Louis Levine <llevine@ngpvan.com>

Thu, Aug 17, 2017 at 6:45 PM

To: Jonathan Zucker <jonathan@itstarts.today>

Cc: Kerry Dolan <kdolan@ngpvan.com>, EveryAction Support <EASupport@everyaction.com>

Hey Jonathan. My plan was to try and massage this into a usable .fec file for you. So a file with your ID, contact info, and the contrib (and distribution) info.

[Quoted text hidden]

Jonathan Zucker <jonathan@itstarts.today>

Fri, Aug 18, 2017 at 10:21 AM

To: Louis Levine <llevine@ngpvan.com>

Cc: Kerry Dolan <kdolan@ngpvan.com>, EveryAction Support <EASupport@everyaction.com>

Hey Louis...

So this would be a file that we would then have to add to and modify in FECFile?

Will it include distribution data I've put (or still need to put... this whole upload issue has slowed down the time devoted to entering distributions, but we do have more of those to enter into everyaction) into EveryAction? Will I be able to amend such a report easily in the future should I need to?

This does not feel like much of a solution and really does not explain why uploading data, even at this scale, is such a problem. It's just not a lot of data nor is it complicated.

If you can't solve this problem now, why will you be able to solve a similar level of data in the future?

Jonathan

[Quoted text hidden]

Louis Levine <llevine@ngpvan.com>

Fri, Aug 18, 2017 at 11:21 AM

To: Jonathan Zucker <jonathan@itstarts.today>

Cc: Kerry Dolan <kdolan@ngpvan.com>, EveryAction Support <EASupport@everyaction.com>

Hey Jonathan.

I wasn't going to put it in FECFile, I was going to turn it into a .FEC myself. Our engineers are actively working on a solution, but I was looking to see if there are some shortcuts to get you filed ASAP, and then sort out the data afterwards.

A4

If that doesn't make sense, that's ok. I was just trying to get you to a filing-ready place as quickly as possible.

From: Jonathan Zucker [mailto:jonathan@itstarts.today]
Sent: Friday, August 18, 2017 10:21 AM
To: Louis Levine <llevine@ngpvan.com>
Cc: Kerry Dolan <kdolan@ngpvan.com>; EveryAction Support <EASupport@everyaction.com>
Subject: Re: Contribution Data

[Quoted text hidden]

Jonathan Zucker <jonathan@itstarts.today>
To: Louis Levine <llevine@ngpvan.com>
Cc: Kerry Dolan <kdolan@ngpvan.com>, EveryAction Support <EASupport@everyaction.com>

Sun, Aug 20, 2017 at 4:13 PM

Would you be able to dump everything currently (well, once I get it all in) in your system to the .FEC?

Just massaging the large data dump into a .FEC gets the bulk of the transactions into the FEC's system would be good, but would also result in a large amended report and they don't like that, either.

[Quoted text hidden]

Louis Levine <llevine@ngpvan.com>
To: Jonathan Zucker <jonathan@itstarts.today>
Cc: Kerry Dolan <kdolan@ngpvan.com>, EveryAction Support <EASupport@everyaction.com>

Mon, Aug 21, 2017 at 8:30 AM

I could probably make that happen. Just need to make sure it's not duplicating data.

-----Original Message-----

From: Jonathan Zucker [mailto:jonathan@itstarts.today]
[Quoted text hidden]

Jonathan Zucker <jonathan@itstarts.today>
To: Louis Levine <llevine@ngpvan.com>
Cc: Kerry Dolan <kdolan@ngpvan.com>, EveryAction Support <EASupport@everyaction.com>

Mon, Aug 28, 2017 at 6:46 PM

I now have all the disbursements in EveryAction.

If we were to dump all of the following out of EveryAction:

- 1) All disbursements
- 2) All contributions that do not have any data in the "notes" field

That would not duplicate the data file I can generate with all of the contributor and contribution data for the earmarked transactions.

Is this something we can do?

[Quoted text hidden]

Kerry Dolan <kdolan@ngpvan.com>

Tue, Aug 29, 2017 at 10:15 AM

To: Jonathan Zucker <jonathan@itstarts.today>, Louis Levine <llevine@ngpvan.com>

Cc: EveryAction Support <EASupport@everyaction.com>

Hi Jonathan,

We're working on the .fec file on this, but here's the dump of all contributions as well as just the ones that didn't have notes attached.

Can you confirm these files are what you're looking for?

Thanks!

KERRY DOLAN
Client Services, NGP VAN
P. 617.718.2980

-----Original Message-----

From: Jonathan Zucker [mailto:jonathan@itstarts.today]
[Quoted text hidden]

 ItStartsToday.zip
6825K

John Pepper <JPepper@ngpvan.com>

Tue, Aug 29, 2017 at 5:47 PM

To: "jonathan@itstarts.today" <jonathan@itstarts.today>

Cc: Kerry Dolan <kdolan@ngpvan.com>, Louis Levine <llevine@ngpvan.com>

Jonathan,

You should have just received an invite to an NGP Sharefile. The Sharefile folder you have access to should have your .FEC file you can upload to the FEC.

Let us know if you have any questions,

JOHN PEPPER
Senior Client Services Specialist, NGP VAN
P. 202.686.9330 | E. jpepper@ngpvan.com

-----Original Message-----

From: Jonathan Zucker [mailto:jonathan@itstarts.today]
[Quoted text hidden]

Jonathan Zucker <jonathan@itstarts.today>

Tue, Aug 29, 2017 at 7:20 PM

To: John Pepper <JPepper@ngpvan.com>

Cc: Kerry Dolan <kdolan@ngpvan.com>, Louis Levine <llevine@ngpvan.com>

Hi John (and Kerry and Louis)...

I have been away from a computer most of the day and it looks like that resulted in wasted time. My apologies for that.

I was asking a question, not giving a "go." Kerry sending me the data file was a real help, but only once I was at a computer where I could review it (just now).

The data file for the "no notes" contributions revealed that this is not what was needed and that is my fault. I forgot that a number of contributions I could provide had "notes" in them even though they are not earmarked to provide the FEC with needed information.

A4

This is what needs to happen:

1) If you could pull all disbursements entered into Every Action. This is the data I can't provide separately and have recorded them all.

I will then provide three data files, two of which are attached:

- 2) Organization Contributions. There is one of these. File attached.
- 3) Non-Recurring Contributions. There are a bunch of these. File attached.
- 4) Recurring Contributions. There are a whole lot of these. File forthcoming.

Again... sorry that my time away from a computer resulted in wasted efforts.

Jonathan

[Quoted text hidden]

2 attachments

 **FOR NGP - Non-Recurring Contributions.txt**
1785K

 **FOR NGP - Organization Contribution.txt**
1K

Kerry Dolan <kdolan@ngpvan.com>

Wed, Aug 30, 2017 at 9:21 AM

To: Jonathan Zucker <jonathan@itstarts.today>, John Pepper <JPepper@ngpvan.com>

Cc: Louis Levine <llevine@ngpvan.com>

Hi Jonathan,

I'm not sure what you need for columns in your disbursement report, but I ran the default values and have attached them here.

You can run this at any time by logging in and going to the report center (bottom of the center column) and running the disbursement report. Additional columns can be added with the "Edit Columns" button on the right, and you can adjust date filters with the Edit Filters button towards the top.

We also have specific report formats that can generate recurring commitment reports and the like, as well as contribution reports like the one I ran yesterday. I actually saved that as a shared custom format called Contribution Report_Addresses_Notes in case you need to run that again. You'd see that under the saved report formats rather than the default ones.

Thanks,

KERRY DOLAN
Client Services, NGP VAN
P. 617.718.2980

-----Original Message-----

From: Jonathan Zucker [mailto:jonathan@itstarts.today]

[Quoted text hidden]

 **DisbursementReport-7530550908.zip**
3K

Jonathan Zucker <jonathan@itstarts.today>

Wed, Aug 30, 2017 at 12:36 PM

To: Kerry Dolan <kdolan@ngpvan.com>

Cc: John Pepper <JPepper@ngpvan.com>, Louis Levine <llevine@ngpvan.com>

I think we need to get on a call as I am utterly lost as to what is going on here.

I thought Louis was offering to take some data we have and some data that is in EveryAction and combine it into a .fec file we can then submit to the FEC to get SOMETHING in as a report as we are now a month late.

I don't understand how you sending me a disbursements report is part of that, though, so can we find some time to chat?

[Quoted text hidden]

Kerry Dolan <kdolan@ngpvan.com>

Wed, Aug 30, 2017 at 1:01 PM

To: Jonathan Zucker <jonathan@itstarts.today>

Cc: John Pepper <JPepper@ngpvan.com>, Louis Levine <llevine@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

Hi Jonathan,

We can certainly hop on the phone, but on short notice we have some schedule conflicts. What does your general availability look like between now and 6pm?

KERRY DOLAN
Client Services, NGP VAN
P. 617.718.2980

-----Original Message-----

From: Jonathan Zucker [mailto:jonathan@itstarts.today]

[Quoted text hidden]

Jonathan Zucker <jonathan@itstarts.today>

Wed, Aug 30, 2017 at 1:18 PM

To: Kerry Dolan <kdolan@ngpvan.com>

Cc: John Pepper <JPepper@ngpvan.com>, Louis Levine <llevine@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

3-4pm would be my best window. Any chance that works for you?

[Quoted text hidden]

Kerry Dolan <kdolan@ngpvan.com>

Wed, Aug 30, 2017 at 2:05 PM

To: Jonathan Zucker <jonathan@itstarts.today>

Cc: John Pepper <JPepper@ngpvan.com>, Louis Levine <llevine@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

Hi Jonathan,

I have a standing call from 3-4, but both Lou and John would be available at 3:30 for a call. If that works, we can send you a Go to Meeting invite for the conference call.

Thanks,

KERRY DOLAN
Client Services, NGP VAN
P. 617.718.2980

-----Original Message-----

From: Jonathan Zucker [mailto:jonathan@itstarts.today]

Sent: Wednesday, August 30, 2017 1:18 PM

To: Kerry Dolan <kdolan@ngpvan.com>

[Quoted text hidden]

Jonathan Zucker <jonathan@itstarts.today>

Wed, Aug 30, 2017 at 2:33 PM

To: Kerry Dolan <kdolan@ngpvan.com>

Cc: John Pepper <JPepper@ngpvan.com>, Louis Levine <llevine@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

A4

That would be perfect.
[Quoted text hidden]

Jonathan Zucker <jonathan@itstarts.today>

Wed, Aug 30, 2017 at 3:11 PM

To: Kerry Dolan <kdolan@ngpvan.com>

Cc: John Pepper <JPepper@ngpvan.com>, Louis Levine <llevine@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

Just wanted to follow-up on the GoToMeeting...

On Wed, Aug 30, 2017 at 2:33 PM, Jonathan Zucker

[Quoted text hidden]

John Pepper <JPepper@ngpvan.com>

Wed, Aug 30, 2017 at 3:18 PM

To: Jonathan Zucker <jonathan@itstarts.today>, Kerry Dolan <kdolan@ngpvan.com>

Cc: Louis Levine <llevine@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

Just created it. Here's the info:

It Starts Today

Wed, Aug 30, 2017 3:30 PM - 4:00 PM EDT

Please join my meeting from your computer, tablet or smartphone.

You can also dial in using your phone.

United States:

Access Code:

More phone numbers

Canada:

First GoToMeeting? Try a test session: <https://care.citrixonline.com/g2m/getready>

JOHN PEPPER

Senior Client Services Specialist, NGP VAN

P. 202.686.9330 | E. jpepper@ngpvan.com

-----Original Message-----

From: Jonathan Zucker [<mailto:jonathan@itstarts.today>]

[Quoted text hidden]

Jonathan Zucker <jonathan@itstarts.today>

Wed, Aug 30, 2017 at 3:32 PM

To: John Pepper <JPepper@ngpvan.com>

Cc: Kerry Dolan <kdolan@ngpvan.com>, Louis Levine <llevine@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

Got it... on the line.

[Quoted text hidden]

Jonathan Zucker <jonathan@itstarts.today>

Wed, Aug 30, 2017 at 6:43 PM

To: John Pepper <JPepper@ngpvan.com>

Cc: Kerry Dolan <kdolan@ngpvan.com>, Louis Levine <llevine@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

Here is the .zip file:

On Wed, Aug 30, 2017 at 3:32 PM, Jonathan Zucker

[Quoted text hidden]

Jonathan Zucker <jonathan@itstarts.today>

Wed, Aug 30, 2017 at 10:12 PM

A4

To: John Pepper <JPepper@ngpvan.com>

Cc: Kerry Dolan <kdolan@ngpvan.com>, Louis Levine <llevine@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

The contribution total from transactions in the file I linked to is \$90,483.43. That should be the only addition you need to make to the summary data as everything is coming out of EveryAction and should total correctly.

Thank you!

On Wed, Aug 30, 2017 at 6:43 PM, Jonathan Zucker

[Quoted text hidden]

Louis Levine <llevine@ngpvan.com>

Fri, Sep 1, 2017 at 11:12 AM

To: Jonathan Zucker <jonathan@itstarts.today>, John Pepper <JPepper@ngpvan.com>

Cc: Kerry Dolan <kdolan@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

Hey Jonathan,

See attached.

It's the cover page (updated based on your calcs), plus the first 500 records of schedule A. It should give you a sense of what it'll look like.

I made the assumption that there is no disbursement for any of these, as they were all for nominee funds. If that's not right, let me know and we'll adjust.

If you tell me the cover page numbers are good, and that you like what the details look like, I'll get the files pasted together (that will be its own challenge.).

The file will be over 1GB, so then we have to get that filed. Not sure how well that will go, but FEC says it should work.

If you need me to actually hit send on it, I can do that as well.

-Lou

-----Original Message-----

From: Jonathan Zucker [mailto:jonathan@itstarts.today]

Sent: Wednesday, August 30, 2017 10:13 PM

To: John Pepper <JPepper@ngpvan.com>

Cc: Kerry Dolan <kdolan@ngpvan.com>; Louis Levine <llevine@ngpvan.com>; Mark Puleo <MPuleo@ngpvan.com>

Subject: Re: Contribution Data

[Quoted text hidden]

2 attachments

 **ItStartsToday_FEC_MY - Cover.fec**
98K

 **ItStartsToday_FEC_MY - Cover_allpages.pdf**
717K

Jonathan Zucker <jonathan@itstarts.today>

Fri, Sep 1, 2017 at 11:16 AM

To: Louis Levine <llevine@ngpvan.com>

Cc: John Pepper <JPepper@ngpvan.com>, Kerry Dolan <kdolan@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

This looks good (I notice a small error I made... one of the VA candidates is in as a federal recipient, but we're going to have to file an amended report anyway, so I don't want to ask you to redo anything because of \$4.57).

Thank you!!!!

A4

Can we get it filed? What do I need to do? Or what do you need from me?

[Quoted text hidden]

Louis Levine <llevine@ngpvan.com>

Tue, Sep 5, 2017 at 10:13 AM

To: Jonathan Zucker <jonathan@itstarts.today>

Cc: John Pepper <JPepper@ngpvan.com>, Kerry Dolan <kdolan@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

Hey Jonathan,

So here is a link to the file. I got it to validate, although it took a bunch of effort (had to clean up a bunch of the names in the .fec file).

So if you want to download and file it, go ahead. If you want me to, just send me the PW. Alternatively, we could tell ask the FEC to process it on the backend due to size. We may need to do that anyway.

From: Jonathan Zucker [mailto:jonathan@itstarts.today]

Sent: Friday, September 1, 2017 11:17 AM

To: Louis Levine <llevine@ngpvan.com>

Cc: John Pepper <JPepper@ngpvan.com>; Kerry Dolan <kdolan@ngpvan.com>; Mark Puleo <MPuleo@ngpvan.com>

Subject: Re: Contribution Data

[Quoted text hidden]

Jonathan Zucker <jonathan@itstarts.today>

Tue, Sep 5, 2017 at 10:46 AM

To: Louis Levine <llevine@ngpvan.com>

Cc: John Pepper <JPepper@ngpvan.com>, Kerry Dolan <kdolan@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

Probably best for you to do the upload. Thanks.

And the "fix" to the upload engine has resulted in major improvements.

[Quoted text hidden]

Louis Levine <llevine@ngpvan.com>

Tue, Sep 5, 2017 at 1:26 PM

To: Jonathan Zucker <jonathan@itstarts.today>

Cc: John Pepper <JPepper@ngpvan.com>, Kerry Dolan <kdolan@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

FWIW – tried earlier, too big to load. I sent it to FEC to process.

From: Jonathan Zucker [mailto:jonathan@itstarts.today]

Sent: Tuesday, September 5, 2017 10:46 AM

A4

[Quoted text hidden]

[Quoted text hidden]

Jonathan Zucker <jonathan@itstarts.today>

Tue, Sep 5, 2017 at 1:27 PM

To: Louis Levine <llevine@ngpvan.com>

Cc: John Pepper <JPepper@ngpvan.com>, Kerry Dolan <kdolan@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

Thanks.

[Quoted text hidden]

Louis Levine <llevine@ngpvan.com>

Wed, Sep 6, 2017 at 5:02 PM

To: Jonathan Zucker <jonathan@itstarts.today>

Cc: John Pepper <JPepper@ngpvan.com>, Kerry Dolan <kdolan@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

It's done!

<https://www.fec.gov/data/committee/C00630012/?tab=filings&cycle=2018>

From: Jonathan Zucker [mailto:jonathan@itstarts.today]

Sent: Tuesday, September 5, 2017 1:28 PM

To: Louis Levine <llevine@ngpvan.com>

[Quoted text hidden]

[Quoted text hidden]

Jonathan Zucker <jonathan@itstarts.today>

Wed, Sep 6, 2017 at 6:43 PM

To: Louis Levine <llevine@ngpvan.com>

Cc: John Pepper <JPepper@ngpvan.com>, Kerry Dolan <kdolan@ngpvan.com>, Mark Puleo <MPuleo@ngpvan.com>

Many thanks.

As the import engine is much faster, I expect we'll never have to do this again.

[Quoted text hidden]

View: / Bulk Upload Batches

BULK UPLOAD
Bulk Upload Batches

Jump To Mapping Templates

Work On My Existing Files

Committee:
 View:
 To: 500
 Date From: 7/1/2017
 Date To: 8/31/2017
 Upload Type:
 Remember Filters

Active Bulk Batches

Your Bulk Upload Batch may still be processing. Refresh to update the table.

Import Name	Upload Type	User	Date	Count	Processed	Created	Updated	Complete	Issues	Original File
VA Committees	Upload Contacts	Zucker, J.	7/28/17	88	100% Processed	87	0	88	0 Issues	VA-Committees-Import-File.csv
IST Subscribers 20170731	Apply External ID	Zucker, J.	7/31/17	2,271	100% Processed	0	2,271	2,271	0 Issues	IST-Subscribers-20170731.csv
IST Subscribers 20170731	Upload Contacts	Zucker, J.	7/31/17	2,271	100% Processed	2,271	0	2,271	0 Issues	IST-Subscribers-20170731.csv
reupload of errors 20170731	Apply External ID	Zucker, J.	7/31/17	6	100% Processed	0	6	6	0 Issues	reupload-errors-20170731.csv
reupload of errors 20170731	Upload Contacts	Zucker, J.	7/31/17	6	100% Processed	6	0	6	0 Issues	reupload-errors-20170731.csv
reupload 20170731	Apply External ID	Zucker, J.	7/31/17	3	100% Processed	0	3	3	0 Issues	reupload-20170731.csv
reupload 20170731	Upload Contacts	Zucker, J.	7/31/17	3	100% Processed	3	0	3	0 Issues	reupload-20170731.csv
NonFund	Upload Contacts	Zucker, J.	7/31/17	475	100% Processed	475	0	475	0 Issues	NonFund.csv
IST Non Sub 2	Apply Contributions: Credit Card	Zucker, J.	7/31/17	12,888	100% Processed	0	12,888	12,888	0 Issues	IST-Non-Sub-2.csv
IST Non Sub 2	Upload Contacts	Zucker, J.	7/31/17	12,888	100% Processed	12,888	0	12,888	0 Issues	IST-Non-Sub-2.csv
IST Donations non Sub	Apply Contributions: Credit Card	Zucker, J.	7/31/17	62	100% Processed	0	62	62	0 Issues	IST-Donations-non-Sub.csv
IST Donations non Sub	Upload Contacts	Zucker, J.	7/31/17	62	100% Processed	0	62	62	0 Issues	IST-Donations-non-Sub.csv
2017Q1Q2 Subscriptions 0000 a	Apply Contributions: Credit Card	Zucker, J.	8/1/17	49,999	Cancelled	0	0	0	0 Issues	2017Q1Q2-Subscriptions-0000-a.csv
2017Q1Q2 Subscriptions 0000 a	Apply External ID	Zucker, J.	8/1/17	49,999	Cancelled	0	0	0	0 Issues	2017Q1Q2-Subscriptions-0000-a.csv
EveryAction Test	Apply External ID	Blake, N.	8/3/17	0	Cancelled	0	0	0	0 Issues	EveryAction-Test.csv
EveryAction Test	Upload Contacts	Blake, N.	8/3/17	0	Cancelled	0	0	0	0 Issues	EveryAction-Test.csv
0000	Apply Contributions: Credit Card	Zucker, J.	8/3/17	50,000	Cancelled	0	0	0	0 Issues	0000.csv
0000	Apply External ID	Zucker, J.	8/3/17	50,000	Cancelled	0	0	0	0 Issues	0000.csv
Q1Q2_0000	Apply Contributions: Credit Card	Zucker, J.	8/4/17	50,000	100% Processed	0	50,000	50,000	0 Issues	Q1Q2_0000.csv
Q1Q2_0000	Upload Contacts	Zucker, J.	8/4/17	50,000	100% Processed	50,000	0	50,000	0 Issues	Q1Q2_0000.csv
Q1Q2_0001	Apply Contributions: Credit Card	Zucker, J.	8/4/17	50,000	100% Processed	0	50,000	50,000	0 Issues	Q1Q2_0001.csv
Q1Q2_0001	Upload Contacts	Zucker, J.	8/4/17	50,000	100% Processed	50,000	0	50,000	0 Issues	Q1Q2_0001.csv
Q1Q2_0002csv	Apply External ID	Zucker, J.	8/4/17	50,000	Cancelled	0	0	0	0 Issues	Q1Q2_0002csv.csv
Q1Q2_0002csv	Apply Contributions: Credit Card	Zucker, J.	8/4/17	50,000	100% Processed	0	50,000	50,000	0 Issues	Q1Q2_0002csv.csv
Q1Q2_0002csv	Upload Contacts	Zucker, J.	8/4/17	50,000	100% Processed	50,000	0	50,000	0 Issues	Q1Q2_0002csv.csv
Q1Q2_0003	Apply Contributions: Credit Card	Zucker, J.	8/4/17	50,000	Cancelled	0	0	0	0 Issues	Q1Q2_0003.csv
Q1Q2_0003	Apply External ID	Zucker, J.	8/4/17	50,000	Cancelled	0	0	0	0 Issues	Q1Q2_0003.csv
Q1Q2_0003	Upload Contacts	Zucker, J.	8/4/17	50,000	Cancelled	0	0	0	0 Issues	Q1Q2_0003.csv
Q1Q2_0004	Apply Contributions: Credit Card	Zucker, J.	8/4/17	50,000	Cancelled	0	0	0	0 Issues	Q1Q2_0004.csv
Q1Q2_0004	Upload Contacts	Zucker, J.	8/4/17	50,000	Cancelled	0	0	0	0 Issues	Q1Q2_0004.csv
Q1Q2_0003b1	Apply Contributions: Credit Card	Zucker, J.	8/7/17	50,000	Cancelled	0	0	0	0 Issues	Q1Q2_0003b1.csv
Q1Q2_0003b1	Upload Contacts	Zucker, J.	8/7/17	50,000	Cancelled	0	0	0	0 Issues	Q1Q2_0003b1.csv
Q1Q2_0004b1	Apply Contributions: Credit Card	Zucker, J.	8/7/17	50,000	Cancelled	0	0	0	0 Issues	Q1Q2_0004b1.csv
Q1Q2_0004b1	Upload Contacts	Zucker, J.	8/7/17	50,000	Cancelled	0	0	0	0 Issues	Q1Q2_0004b1.csv
Q1Q20003b1	Apply Contributions: Credit Card	Zucker, J.	8/8/17	50,000	100% Processed	0	50,000	50,000	0 Issues	Q1Q20003b1.csv
Q1Q20003b1	Upload Contacts	Zucker, J.	8/8/17	50,000	100% Processed	0	50,000	50,000	0 Issues	Q1Q20003b1.csv
Q1Q20004b1	Apply Contributions: Credit Card	Zucker, J.	8/8/17	50,000	100% Processed	0	50,000	50,000	0 Issues	Q1Q20004b1.csv
Q1Q20004b1	Upload Contacts	Zucker, J.	8/8/17	50,000	100% Processed	0	50,000	50,000	0 Issues	Q1Q20004b1.csv
Q1Q2_0005b1	Apply Contributions: Credit Card	Zucker, J.	8/8/17	50,000	100% Processed	0	50,000	50,000	0 Issues	Q1Q2_0005b1.csv
Q1Q2_0005b1	Upload Contacts	Zucker, J.	8/8/17	50,000	100% Processed	0	50,000	50,000	0 Issues	Q1Q2_0005b1.csv

Bulk Upload Batches

BULK UPLOAD
Bulk Upload Batches

Jump To Mapping Templates Work On My Existing Files

Committee
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View
All Batches

Top
500

Date From
7/1/2017

Date To
8/31/2017

Upload Type

Remember Filters

Active Bulk Batches

Your Bulk Upload Batch may still be processing. Refresh to update the table.

Import Name	Upload Type	User	Date	Count	Processed	Created	Updated	Complete	Issues	Original File
Q1Q20006.txt	Apply Contributions: Credit Card	Zucker, J.	8/9/17	50,000	100% Processed	0	107	107	0 Issues	at subscription donations Q1 and Q2
Q1Q20006.txt	Upload Contacts	Zucker, J.	8/9/17	50,000	100% Processed	0	107	107	0 Issues	at subscription donations Q1 and Q2
Q1Q20007.txt	Apply Contributions: Credit Card	Zucker, J.	8/9/17	50,000	100% Processed	0	410	510	0 Issues	at subscription donations Q1 and Q2
Q1Q20007.txt	Upload Contacts	Zucker, J.	8/9/17	50,000	100% Processed	309	107	309	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0008.txt	Apply Contributions: Credit Card	Zucker, J.	8/9/17	50,000	100% Processed	0	106	106	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0008.txt	Upload Contacts	Zucker, J.	8/9/17	50,000	100% Processed	0	106	106	0 Issues	at subscription donations Q1 and Q2
Q1Q20009.txt	Apply Contributions: Credit Card	Zucker, J.	8/9/17	50,000	Cancelled	0	0	0	0 Issues	at subscription donations Q1 and Q2
Q1Q20009.txt	Upload Contacts	Zucker, J.	8/9/17	50,000	100% Processed	0	107	107	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0010.txt	Apply Contributions: Credit Card	Zucker, J.	8/9/17	50,000	100% Processed	0	106	106	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0010.txt	Upload Contacts	Zucker, J.	8/9/17	50,000	100% Processed	0	106	106	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0011.txt	Apply Contributions: Credit Card	Zucker, J.	8/9/17	50,000	100% Processed	0	574	574	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0011.txt	Upload Contacts	Zucker, J.	8/9/17	50,000	100% Processed	489	107	510	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0012.txt	Apply Contributions: Credit Card	Zucker, J.	8/10/17	49,531	Cancelled	0	0	0	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0012.txt	Upload Contacts	Zucker, J.	8/10/17	49,531	100% Processed	0	106	106	0 Issues	at subscription donations Q1 and Q2
HaberCorrection	Apply Contributions: Credit Card	Zucker, J.	8/10/17	489	100% Processed	0	1	1	0 Issues	Haber.txt
HaberCorrection	Upload Contacts	Zucker, J.	8/10/17	469	100% Processed	0	1	1	0 Issues	Haber.txt
Q1Q2_0013.txt	Apply Contributions: Credit Card	Zucker, J.	8/10/17	50,000	Cancelled	0	0	0	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0013.txt	Upload Contacts	Zucker, J.	8/10/17	50,000	100% Processed	0	106	106	0 Issues	at subscription donations Q1 and Q2
CorrectingLastNames	Upload Contacts	Zucker, J.	8/12/17	319	100% Processed	0	106	106	0 Issues	CorrectingLastNames.txt
_VANID_Q1Q2_0000	Apply Contributions: Credit Card	Zucker, J.	8/14/17	49,531	100% Processed	0	106	106	0 Issues	at subscription donations Q1 and Q2
_VANID_Q1Q2_0000	Upload Contacts	Zucker, J.	8/14/17	49,531	100% Processed	0	106	106	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0009_VAN	Apply Contributions: Credit Card	Zucker, J.	8/24/17	49,531	100% Processed	0	106	106	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0009_VAN	Upload Contacts	Zucker, J.	8/24/17	49,531	100% Processed	0	106	106	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0012_VAN	Apply Contributions: Credit Card	Zucker, J.	8/25/17	50,000	100% Processed	0	106	106	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0012_VAN	Upload Contacts	Zucker, J.	8/25/17	50,000	100% Processed	0	106	106	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0013_VAN	Apply Contributions: Credit Card	Zucker, J.	8/25/17	49,531	100% Processed	0	107	107	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0013_VAN	Upload Contacts	Zucker, J.	8/25/17	49,531	100% Processed	0	107	107	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0014_VAN	Apply Contributions: Credit Card	Zucker, J.	8/27/17	49,531	100% Processed	0	107	107	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0014_VAN	Upload Contacts	Zucker, J.	8/27/17	49,531	100% Processed	0	107	107	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0015_VAN	Apply Contributions: Credit Card	Zucker, J.	8/27/17	49,531	100% Processed	0	104	104	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0015_VAN	Upload Contacts	Zucker, J.	8/27/17	49,531	100% Processed	0	104	104	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0016_VAN	Apply Contributions: Credit Card	Zucker, J.	8/27/17	49,531	100% Processed	0	104	104	0 Issues	at subscription donations Q1 and Q2
Q1Q2_0016_VAN	Upload Contacts	Zucker, J.	8/27/17	49,531	100% Processed	0	104	104	0 Issues	at subscription donations Q1 and Q2
startsTodayNonre.xlsx	Save as Saved List	Dolan, K.	8/29/17	96	100% Processed	0	0	0	0 Issues	startsTodayNonre.xlsx

74 Bulk Upload Batches - 2 Pages 1 2

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 20, 2017

**REVIEWING OFFICER RECOMMENDATION
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 3343 – It Starts Today and Jonathan Zucker, in his official capacity as Treasurer (C00630012)

Summary of Recommendation

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess an \$11,114 civil money penalty.

Reason-to-Believe Background

The 2017 Mid-Year Report was due on July 31, 2017. The respondents filed the report on September 5, 2017, 36 days late. The report is not election sensitive and was not filed within 30 days of the due date; therefore, the report is considered not filed. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On September 20, 2017, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2017 Mid-Year Report and made a preliminary determination that the civil money penalty was \$11,114 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on September 22, 2017 to notify them of the Commission's RTB finding and civil money penalty.

Legal Requirements

The Federal Election Campaign Act ("Act") states that the treasurer of a committee not authorized by a candidate shall file, in a non-election year, a report for the period ending June 30 no later than July 31. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(c)(2)(i). Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on July 31 for the Mid-Year Report to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

Summary of Respondents' Challenge

On October 24, 2017, the Commission received the written response ("challenge") from the Treasurer. The Treasurer explains that the Committee received over 4 million earmarked contributions, plus thousands of other non-earmarked contributions, during the reporting period. The Committee initially attempted to upload its data into FECFile. This process proved to be slow, and the data files became too large for their computer to handle. The Committee then made the decision to use a third party software vendor to file its reports. The challenge details the numerous technical difficulties the Committee experienced with its software provider from July 14, 2017 through September 5, 2017 and provides supporting documentation. See Attachment 1.

The Treasurer acknowledges the report was filed late but believes the technical difficulties were unforeseen, and the Committee used its best efforts to timely file. The Treasurer also notes the third party software vendor has deployed the necessary enhancements to its system, which have proven to greatly improve upload speeds. The Treasurer states the Committee's next filing will be timely.

Analysis

The Treasurer states the Committee chose to use a third party software vendor after its attempts to upload the 2017 Mid-Year Report data into FECFile were unsuccessful. Specifically, uploading to FECFile proved to be slow, and the data files were too large for their computer to handle.¹ The Committee believed a third party software would be better equipped to handle the Committee's data and filings, but the Committee experienced significant technical difficulties for several weeks.

The Reviewing Officer appreciates the detailed account of technical difficulties presented in the challenge and acknowledges the respondents' diligence. However, delays caused by committee vendors or contractors, and committee computer or software failures are all included at 11 C.F.R. § 111.35(d) as examples of a circumstance that will not be considered reasonably unforeseen and beyond the respondents' control. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a).

At the time of the RTB finding, the Commission calculated the penalty based on the level of activity disclosed on the 2017 Mid-Year Report filed September 5, 2017 (\$277,875). 11 C.F.R. § 111.43(d)(2)(i). The Committee filed an Amended 2017 Mid-Year Report on December 5, 2017. The report discloses a level of activity of \$263,280. Using the schedule of penalties at 11 C.F.R. § 111.43(a), the civil money penalty remains \$11,114.

The Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess an \$11,114 civil money penalty.

¹ The Committee did not contact Commission staff in an attempt to troubleshoot the performance issues with FECFile.

OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 3343 involving It Starts Today and Jonathan Zucker, in his official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 3343 that It Starts Today and Jonathan Zucker, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess an \$11,114 civil money penalty; and
3. Send the appropriate letter.

Attachments

- Attachment 1 –
- Attachment 2 –
- Attachment 3 – Declaration from RAD
- Attachment 4 – Declaration from OAR

DECLARATION OF KRISTIN D. ROSER

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to It Starts Today:
 - A) Non-Filer Letter, dated August 16, 2017, referencing the 2017 Mid-Year Report (sent via electronic mail to: info@itstarts.today);
 - B) Reason-to-Believe Letter, dated September 21, 2017, referencing the 2017 Mid-Year Report (sent via overnight mail to the address of record).
4. I hereby certify that I have searched the Commission's public records and find that It Starts Today filed the 2017 Mid-Year Report with the Commission on September 5, 2017.
5. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 7th day of November, 2017.

Kristin Roser

Kristin D. Roser
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

August 16, 2017

ZUCKER, JONATHAN, TREASURER
IT STARTS TODAY
237 FLORIDA AVENUE NW
WASHINGTON, DC 20001

IDENTIFICATION NUMBER: C00630012

REFERENCE: MID-YEAR REPORT REPORT (01/01/2017 - 06/30/2017)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a)

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, N.W., Washington, DC 20463. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report or relevant portions must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Ben Holly in the Reports Analysis Division on our toll free number (800)424-9530. The analyst's direct number is (202)694-1129.

DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A political committee not authorized by a candidate shall file a report for the period ending June 30 no later than July 31 in a non-election year. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time July 31, 2017 for the 2017 Mid-Year Report to be timely filed.
- 3) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
 - a) Cover Page and Detailed Summary Pages of the Amended 2017 Mid-Year Report filed by It Starts Today and Jonathan Zucker, in his official capacity as Treasurer. The report includes the coverage period of January 1, 2017 through June 30, 2017 and was filed on December 5, 2017.
- 4) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 20th day of December, 2017.

Rhiannon Magruder
Rhiannon Magruder
Reviewing Officer
Office of Administrative Review
Federal Election Commission

**FEC
FORM 3X****REPORT OF RECEIPTS
AND DISBURSEMENTS**
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (In full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

It Starts Today

ADDRESS (number and street)

237 Florida Avenue NW

Check if different
than previously
reported. (ACC)

Washington

DC

20001

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C C00630012

3. IS THIS
REPORTNEW
(N)

OR

X

AMENDED
(A)4. TYPE OF REPORT
(Choose One)

(a) Quarterly Reports:

April 15
Quarterly Report (Q1)July 15
Quarterly Report (Q2)October 15
Quarterly Report (Q3)January 31
Year-End Report (YE)X July 31 Mid-Year
Report (Non-election
Year Only) (MY)Termination Report
(TER)(b) Monthly
Report
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11)
(Non-Election
Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12)
(Non-Election
Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day
PRE-Election
Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

M M / D D / Y Y Y Y

In the
State of(d) 30-Day
POST-Election
Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

M M / D D / Y Y Y Y

In the
State of

5. Covering Period M M / D D / Y Y Y Y 01 01 2017 through M M / D D / Y Y Y Y 06 30 2017

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Zucker, Jonathan, . .

Type or Print Name of Treasurer

Signature of Treasurer

Zucker, Jonathan, . .

Date

M M / D D / Y Y Y Y 11 25 2017

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office
Use
Only**FEC FORM 3X**
Rev. 05/2016

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

It Starts Today

Report Covering the Period: From: MM / DD / YYYY 01 / 01 / 2017 To: MM / DD / YYYY 06 / 30 / 2017

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2017		5000.00
(b) Cash on Hand at Beginning of Reporting Period.....	5000.00	
(c) Total Receipts (from Line 19).....	194386.82	204386.82
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	199386.82	209386.82
7. Total Disbursements (from Line 31).....	68894.87	68894.87
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)).....	130491.75	140491.75
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D).....	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D).....	0.00	

This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures	67232.73	67232.73
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	67232.73	67232.73
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	1273.69	1273.69
24. Independent Expenditures (use Schedule E).....	0.00	0.00
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	0.00	0.00
29. Other Disbursements (Including Non-Federal Donations).....	388.45	388.45
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	68894.87	68894.87
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	68894.87	68894.87

130001-1-00000001

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	194386.62	204386.62
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	194386.62	204386.62
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	67232.73	67232.73
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	67232.73	67232.73

18001111100001



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 20, 2017

Jonathan Zucker, in official capacity as Treasurer
It Starts Today
237 Florida Avenue, NW
Washington, DC 20001

It Starts Today
C00630012
AF#: 3343

Dear Mr. Zucker:

On September 20, 2017, the Federal Election Commission ("Commission") found reason to believe ("RTB") that It Starts Today and you, in your official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) for failing to timely file the 2017 Mid-Year Report. The Commission also made a preliminary determination that the civil money penalty was \$11,114 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination and assess a civil money penalty. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463 or via facsimile (202-208-3333). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

Rhiannon Magruder
Rhiannon Magruder
Reviewing Officer
Office of Administrative Review

RECEIVED

Ms. Dayna C. Brown
Commission Secretary
Federal Election Commission
999 E Street, NW
Washington, DC 20463

2018 JAN 16 PM 12:30

Re: AF#: 3343

Dear Ms. Brown:

I write in response to the Reviewing Officer's Recommendation concerning the civil money penalty of \$11,114 assessed in this matter.

Given the plain language of the regulations at 11 C.F.R. § 111.35(d), this is simply a plea for mercy from the Commission.

I do not dispute that the filing was late or that the reason it was late was technical difficulties with electronic filing of the report. I mostly write to ask that the Commission temper its justice in this matter with mercy as the regulations that exclude problems of this nature from acceptable "unforeseen" circumstances could not have envisioned the circumstances we encountered.

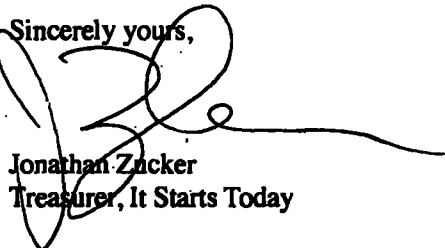
As the Reviewing Officer notes, I was diligent in my attempts to file this report in a timely manner. While, as she also notes, I did not contact the office of electronic filing for support in my attempts to use FECFile for this report, that omission was based on more than a decade of experience in using FECFile (including multiple filings over the last year using the most recent versions of the software). When my attempt to upload 50,000 contributions into FECFile repeatedly stalled, it became clear that uploading more than 2 million additional contribution records had little chance of success. It is possible the staff might have been able to assist me, but that option simply did not occur to me.

At that point I turned to NGP based on their experience handling filings for presidential campaigns, which operate on the same scale as I needed to with my filing.

What made the delay unforeseeable was the fact that in spite of their experience in handling data sets of this size, their upload engine for adding contribution data not generated by their payment pages was completely inadequate to the task. Given that our filing ran around 1.5 million "pages," we were operating in an area in which few had experience and NGP was one firm that did. Unfortunately, their system was not, then, equal to the task. Based on this experience they have upgraded their import engine and it now operates much more efficiently.

I understand that this plea may be inadequate, but given my good faith efforts to get the report in on time, I hope you will look beyond the specific language of 11 C.F.R. § 111.35(d) and waive this penalty.

Sincerely yours,



Jonathan Zucker
Treasurer, It Starts Today



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
JAN 17 2018

2018 JAN 17 AM 11:38

SENSITIVE

January 17, 2018

MEMORANDUM

To: The Commission

Through: Alec Palmer *AP*
Staff Director

From: Patricia C. Orrock *PCO*
Chief Compliance Officer

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 3343 – It Starts Today and Jonathan Zucker, in his official capacity as Treasurer (C00630012)

On September 20, 2017, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2017 Mid-Year Report and made a preliminary determination that the civil money penalty was \$11,114 based on the schedule of penalties at 11 C.F.R. § 111.43.

On October 24, 2017, the Commission received their written response ("challenge"). After reviewing the challenge, the Reviewing Officer Recommendation ("ROR") dated December 20, 2017 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess an \$11,114 civil money penalty.

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). On January 16, 2018, the Commission received their written response. See Attachment 1. The Treasurer reiterates that the Committee received a very large volume of contributions during the reporting period, and its third-party software vendor was unable to efficiently upload and process the data. The Treasurer worked diligently with the vendor until the technical issues were resolved and report was filed.

He acknowledges the challenge does not meet the requirements at 11 C.F.R. § 111.35 but requests that the Commission use its discretion to waive the civil money penalty.

As stated in the ROR, the Reviewing Officer appreciates the detailed account of technical difficulties presented in the challenge and acknowledges the respondents' diligence. However, delays caused by committee vendors or contractors, and committee computer or software failures are all included at 11 C.F.R. § 111.35(d) as examples of a circumstance that will not be considered reasonably unforeseen and beyond the respondents' control. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a).

OAR Recommendations

1. Adopt the Reviewing Officer recommendation for AF# 3343 involving It Starts Today and Jonathan Zucker, in his official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 3343 that It Starts Today and Jonathan Zucker, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess an \$11,114 civil money penalty; and
3. Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 3343
Final Determination Recommendation -)
It Starts Today and Jonathan Zucker, in)
his official capacity as treasurer)
(C00630012))

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election
Commission, do hereby certify that on February 01, 2018, the Commission
decided by a vote of 5-0 to take the following actions in AF 3343:

1. Adopt the Reviewing Officer recommendation for AF# 3343 involving
It Starts Today and Jonathan Zucker, in his official capacity as
Treasurer, in making the final determination.
2. Make a final determination in AF# 3343 that It Starts Today and
Jonathan Zucker, in his official capacity as Treasurer, violated 52
U.S.C. § 30104(a) and assess an \$11,114 civil money penalty.
3. Send the appropriate letter.

Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted
affirmatively for the decision.

Attest:

February 1, 2018
Date

Dayna C. Brown
Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 6, 2018

Jonathan Zucker, in official capacity as Treasurer
It Starts Today
237 Florida Avenue, NW
Washington, DC 20001

C00630012
AF#: 3343

Dear Mr. Zucker:

On September 20, 2017, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that It Starts Today and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2017 Mid-Year Report. By letter dated September 22, 2017, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$11,114 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On October 24, 2017, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that It Starts Today and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and assess a civil money penalty in the amount of \$11,114 in accordance with 11 C.F.R. § 111.43. The Reviewing Officer Recommendation was sent to you on December 20, 2017. On January 16, 2018, the Commission received your written response.

On February 1, 2018, the Commission adopted the Reviewing Officer's recommendation and made a final determination that It Starts Today and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a), and assessed a civil money penalty in the amount of \$11,114. A copy of the Final Determination Recommendation is attached.

At this juncture, the following courses of action are available to you:

1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 CFR § 111.38.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within 30 days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within 5 days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 30% of the civil money penalty amount for its collection services. If the age of the debt is greater than or equal to two years old, Treasury will charge a fee of 32% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the civil money penalty, follow the payment instructions on page 4 of this letter. You should make payment within thirty (30) days of receipt of this letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

Carole C. Hunter

Caroline Hunter
Chair

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 C.F.R. § 111.43, the civil money penalty is \$11,114 for the 2017 Mid-Year Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
PO Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: It Starts Today

FEC ID#: C00630012

AF#: 3343

PAYMENT AMOUNT DUE: \$11,114

14-00000-14-1